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Date: Nov. 1, 2005

Tu-Tu Ho, Examiner
Technology Center, Art Unit 2818
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Re: Responding to Office Action (mailed on 7/12/05) for application no.: 10/781,112

Dear Examiner Ho,

Sorry to respond your Office Action late because I changed my correspondence address. I found out the Office Action from the PAIR system. Form SB22 (Petition for Extension of Time) was submitted with one-month extension fee on a separate mail to Commissioner for Patents.

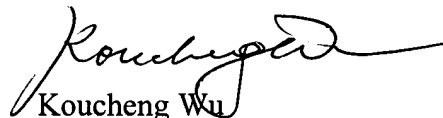
I have the following two comments based on my understanding of your Office Action.

1. The APA (U.S. Patent No. 5,796,142 and 5,885,868 by Lin et al.) is a NOR-type Flash memory as shown in their circuit diagram (Fig. 8) and their layout (Fig. 4) of #5,796,142. NOR cells are connected in parallel, and NAND cells are connected in serial (see Fig.1). When reading a NAND cell, other cells on the same columns must be turned on, while a NOR cell can be independently addressed. Both my invention and the APA are NOR-type Flash memories (see Fig. 2). My invention is different from the APA in all aspects such as cell structure, array architecture, and operation conditions. My invention is not a modification from the NAND-type APA to a NOR-type array.

2. The APA is not a functional invention as explained in my application's Background of the Invention section. The APA cells cannot be programmed because the channels of all the cells on the same word line are connected.

I hope you can consider my comments above and validate all my claims. However, if you do not accept my comments, then the claims are amended as you suggested – Claims 20-22 are allowed and Claims 7-8 become the dependent claims of Claim 20. The amended claims are included for your review.

Sincerely yours,


Koucheng Wu